



Air Quality Permitting Statement of Basis

May 18, 2007

Permit to Construct No. P-2007.0051

TransCanada GTN System, Samuels

Facility ID No. 017-00037

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Proposed PTC

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Acronyms, Units, and Chemical Nomenclatures

AIRS	Aerometric Information Retrieval System
AQCR	Air Quality Control Region
CFR	Code of Federal Regulations
CO	carbon monoxide
DEQ	Department of Environmental Quality
EPA	U.S. Environmental Protection Agency
GTN	Gas Transmission Northwest Corporation
HAPs	Hazardous Air Pollutants
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
MACT	Maximum Achievable Control Technology
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO _x	nitrogen oxides
NSPS	New Source Performance Standards
PM ₁₀	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
PSD	Prevention of Significant Deterioration
PTC	permit to construct
SIC	Standard Industrial Classification
SIP	State Implementation Plan
SO ₂	sulfur dioxide
TAPs	toxic air pollutants
T/yr	tons per year
VOC	volatile organic compound

1. PURPOSE

The purpose for this memorandum is to satisfy the requirements of IDAPA 58.01.01.200, Rules for the Control of Air Pollution in Idaho, for issuing permits to construct and IDAPA 58.01.01.300 for issuing Tier I operating permit.

2. FACILITY DESCRIPTION

TransCanada GTN System operates a network of compressor stations that transmit natural gas from Canada to California along an underground pipeline system. The Samuels compressor station is one of three TransCanada GTN Systems stations located in Idaho; the other stations are located near the cities of Eastport and Athol.

The dual mainline of the network of compressor stations is 612.5 miles in length and includes 639.2 miles of 36-inch and 589.8 miles of 42-inch pipeline. The pipeline enters the United States in northern Idaho, continues through southeastern Washington and central Oregon, and enters California at its northern border. Each compressor station consists of one or more turbine-driven compressors that move the natural gas through the pipeline. The turbines use the natural gas in the pipeline as fuel and provide energy for the compressors to induce the flow of the gas.

3. FACILITY / AREA CLASSIFICATION

The facility is defined as a Prevention of Significant Deterioration (PSD) major facility because the emissions of NO_x are greater than 250 tons per year. The Standard Industrial Classification (SIC) code for the facility is 4922. The AIRS classification is "A" because the potential to emit of NO_x is at major source levels.

The facility is located within AQCR 63 and UTM zone 1. This facility is located 12 miles north of Sandpoint, Idaho in Bonner County. Although Sandpoint and the surrounding area is considered nonattainment for particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM_{10}) emissions, this facility lies outside the PM_{10} nonattainment area. This facility is located in an area that is unclassifiable for all criteria air pollutants.

The AIRS information provided in Appendix A defines the classification for each regulated air pollutant at GTN. This required information is entered into the EPA AIRs database.

4. APPLICATION SCOPE

TransCanada GTN System is proposing to revise PTC No. P-040117 issued March 10, 2005. Revisions include the removal of requirement for visible emissions to be present during performance testing for the Solo NO_x Turbine (Unit 4A).

4.1 *Application Chronology*

March 28, 2007	Application letter received
April 9, 2007	Application determined complete
April 18, 2007	Peer and Regional Review
April 23, 2007	Facility Draft
May 7, 2007	Application and processing fee received

5. PERMIT ANALYSIS

This section of the Statement of Basis describes the regulatory requirements for this PTC action.

5.1 Equipment Listing

There are no equipment changes associated with this permit revision. For a complete equipment listing see the technical memorandum dated April 1, 2002.

5.2 Emissions Inventory

There is no increase in emissions associated with this permit revision. For a description of the emissions and calculations see the technical memorandum dated April 1, 2002.

5.3 Modeling

Since emissions did not increase, ambient air modeling is not required.

5.4 Regulatory Review

This section describes the regulatory analysis of the applicable air quality rules with respect to this PTC.

IDAPA 58.01.01.201.....Permit to Construct Required

The facility’s proposed project does not meet the permit to construct exemption criteria contained in Sections 220 through 223 of the Rules. Therefore, a PTC is required.

IDAPA 58.01.01.203.....Permit Requirements for New and Modified Stationary Sources

The applicant has shown to the satisfaction of DEQ that the facility will comply with all applicable emissions standards, ambient air quality standards, and toxic increments.

IDAPA 58.01.01.209.05.c, 381..... Permit to Construct Procedures for Tier I Sources

This PTC modification is for a Tier I source, therefore, the PTC must be processed according to the procedures for a Tier I source. In particular, this PTC will be processed according to Section 209.05.c. The draft PTC will meet both PTC and Tier I requirements including public comment and affected state review per Sections 209, 364, and 365. The proposed PTC will also be sent to EPA for review, concurrently with the 30-day comment period, per Sections 209.05.c and 366.

The permittee may at any time after issuance of the PTC, request that the PTC requirements be incorporated into the Tier I operating permit through an administrative amendment in accordance with Section 384. It is noted that in the application, TransCanada GTN System has requested that the PTC be issued to modify the existing Tier I permit.

IDAPA 58.01.01.224.....Permit to Construct Application Fee

The applicant satisfied the PTC application fee requirement by submitting a fee of \$1,000.00 on May 7, 2007.

IDAPA 58.01.01.225.....Permit to Construct Processing Fee

This permit revision requires no engineering analysis; therefore, a PTC processing fee of \$250 is required. The processing fee was received May 7, 2007

5.5 Permit Conditions Review

This section describes only those permit conditions that have been revised, modified or deleted as a result of this permit action. All other permit conditions remain unchanged.

Permit Condition 2.11.3

This Permit Condition has been revised because the turbines at Compressor Site No. 4 in Samuels burn pipeline grade natural gas that produces negligible visible emissions. Performance testing shall be in compliance with IDAPA 58.01.01.157 and General Provision 6 of the permit.

Permit Conditions 2.15, 2.16, and 2.17

These permit conditions have been revised because the provisions are duplicative of General Provision 6.

6. PERMIT FEES

In accordance with IDAPA 58.01.01.224, a permit application fee of \$1,000 is required for a PTC. The application fee was submitted May 7, 2007. This permit revision requires no engineering analysis; therefore, a PTC processing fee of \$250 is required. The processing fee was received May 7, 2007.

The facility is a major facility as defined in IDAPA 58.01.01.008.10 and is therefore subject to registration and registration fees in accordance with IDAPA 58.01.01.387. The facility is current with its registration fees.

7. PERMIT REVIEW

7.1 Regional Review of Draft Permit

Coeur d'Alene Regional Office was provided a draft on April 18, 2007. Coeur d'Alene recommended minor typographical alterations, these changes have been incorporated.

7.2 Facility Review of Draft Permit

TransCanada GTN Systems was provided a draft on April 23, 2007. TransCanada GTN Systems had no comments on the draft as written.

7.3 Public comment

In accordance with IDAPA 58.01.01.209.05(c) and 364, a 30-day comment period will be provided for the public, affected states and tribes on the draft PTC and the Tier I operating permit amendment.

IDAPA 58.01.01.008.01 defines affected states as: "All states: whose air quality may be affected by the emissions of the Tier I source and that are contiguous to Idaho; or that are within 50 miles of the Tier I source." The EPA will be provided with an opportunity to comment on the proposed PTC, and this will occur concurrently with the 30-day comment period in accordance with IDAPA 58.01.01.209.05.c.vi and 366.

8. RECOMMENDATION

Based on review of application materials, and all applicable state and federal rules and regulations, staff recommends that GTN be issued a Final PTC No. P-2007.0051 for the revision of the visible performance testing requirement for Unit 4A. The project does not involve PSD requirements.

JP/slm Permit No. P-2007.0051 and T1-2007.0046

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Appendix A

AIRS Information

P-2007.0051

AIRS/AFS^a FACILITY-WIDE CLASSIFICATION^b DATA ENTRY FORM

Facility Name: TransCanada GTN System

Facility Location: Samuels

AIRS Number: 017-00037

AIR PROGRAM POLLUTANT	SIP	PSD	NSPS (Part 60)	NESHAP (Part 61)	MACT (Part 63)	SM80	TITLE V	AREA CLASSIFICATION A-Attainment U-Unclassified N- Nonattainment
SO ₂	B		B					
NO _x	A	A	A				A	
CO	A						A	
PM ₁₀	B							
PT (Particulate)	B							
VOC	B							
THAP (Total HAPs)	B							
APPLICABLE SUBPART								
			GG					

^a Aerometric Information Retrieval System (AIRS) Facility Subsystem (AFS)

^b AIRS/AFS Classification Codes:

- A = Actual or potential emissions of a pollutant are above the applicable major source threshold. For HAPs only, class "A" is applied to each pollutant which is at or above the 10 T/yr threshold, **or** each pollutant that is below the 10 T/yr threshold, but contributes to a plant total in excess of 25 T/yr of all HAPs.
- SM = Potential emissions fall below applicable major source thresholds if and only if the source complies with federally enforceable regulations or limitations.
- B = Actual and potential emissions below all applicable major source thresholds.
- C = Class is unknown.
- ND = Major source thresholds are not defined (e.g., radionuclides).